## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GLOBAL GAMING PHILIPPINES, LLC,

Plaintiff,

v.

No. 21-CV-2655 (LGS) (SN)

ENRIQUE K. RAZON, JR., et al.,

Defendants.

**NOTICE OF MOTION** 

PLEASE TAKE NOTICE that upon the accompanying Declarations of Marjorie T. Uyengco-Nolasco and Ninez C. Maningat, and the accompanying Memorandum of Law, Defendant Enrique K. Razon, Jr., by and through his counsel, will move this Court, at a date and time to be determined, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing, with prejudice, Count V of the Second Amended Complaint ("SAC") in this action and the demand for punitive damages set forth in the SAC for failure to state a claim upon which relief can be granted, and granting such other and/or further relief as the Court deems just and proper.

Dated: April 18, 2022

New York, New York

WALFISH & FISSELL PLLC

By: /s/ Daniel R. Walfish

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